



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 09 2006

Mr. Robert Waldo
Environmental Planner
NFEC Atlantic
6506 Hampton Blvd.
Norfolk, VA 23508-1278

Dear Mr. Waldo:

The Environmental Protection Agency has reviewed the Department of the Navy's (Navy) Draft Environmental Assessment (DEA) for the disposal of Naval Activity Puerto Rico (Formerly Naval Station Roosevelt Roads) dated December 2005. The DEA evaluates the potential environmental impacts of the Navy's proposed action to dispose of approximately 8,435 acres of excess land at Naval Activity Puerto Rico (NAPR). The DEA also evaluates the potential environmental impacts associated with reasonably foreseeable reuse and development of the disposed property to be accomplished by non-federal entities. Approximately 3,686 acres would be available for reuse or development, 230 acres would remain in federal ownership, but transferred to other federal entities, and 3,389 acres would remain as conservation areas.

The Commonwealth of Puerto Rico (Commonwealth) created a Local Redevelopment Authority (LRA) which prepared the Naval Station Roosevelt Roads Reuse Plan. This plan was not appended to the DEA, nor was it available on the web. We would recommend that the plan be available with the DEA to support the analysis of impacts associated with the reuse. Also, provide maps for any natural features that are discussed in the document, such as rivers (such as Rio Daguao), river drainage systems (Rio Daguao, Quebrada Aguas Clara, Quebrada Ceiba), and ocean features (Ensenada Honda, Medio Mundo Passage).

The following are our technical comments on the DEA:

1. Section 3.9 Marine Environment. The DEA must discuss whether the marine environment surrounding the NAPR has benefited from public use restrictions to both commercial fisherman and tourism. If so, this must be documented and the impacts, especially to endangered species, of losing the restrictions analyzed.

2. Figures 3-3, 3-4. Figures 3-3 (Sites Where Cleanup is Complete) and 3-4 (Sites with Remaining Cleanup) are not fully reflective of EPA's understanding of the status of corrective action at the facility. Final decisions on most "sites" at the facility have not yet undergone a required public review. Therefore, Figures 3-3 and 3-4 should not be represented as EPA's final decisions on the status of corrective action at the

facility. Furthermore, the very small scale of the figures precludes fully accurate depiction of relatively small areas where corrective action/clean-up are required.

3. Section 3.8.4. Wildlife. As previously noted by the Fish and Wildlife Service, both *Typhlops richardi* and *Typhlops rostellantus* are members of the family Typhlopidae or blindsnakes. They are not vipers.

4. Section 3.9.4 Mangroves. Was restoration to mangroves, as laid out in the Damage Assessment and Restoration Plan for the Los Machos, completed? If not, will it be completed before the NAPR is turned over to the Commonwealth? Is there a plan to remove the dredged material placed in the Enseñada Honda mangrove tract?

5. Section 4.1 Land Use and Aesthetics. This section should include a description of how the Navy will dispose of the properties that will not to be given to the Commonwealth. Will this be a series of Request for Bids for individual parcels? What will become of parcels that are not sold?

6. Section 4.1.1 Land Use. The existing 9 hole golf course in Zone 3 is expected to be expanded 88 acres to an 18 hole golf course. EPA recommends that the Navy encourage the new golf course developer to join the Region 2's *Nitrogen Management Challenge* to minimize any impacts to the surrounding conservation areas. The *Challenge* is a partnership between local golf courses, EPA, USGA, Cornell University, local government, and concerned citizens with the goal of minimizing loss of Nitrogen fertilizer to surface and ground water. More information can be found at http://www.epa.gov/Region2/p2/nitrogen_management/index.html.

7. Section 4.2 Environmental Contamination. While this Section states that some of the waterfront along the northeast side of Enseñada Honda is contaminated, no mention is made of sediment contamination in berths or channels that would be dredged for ferry and port use. Any known sediment contamination in berths and channels should be identified, otherwise testing should be performed and dredged material management options should be discussed.

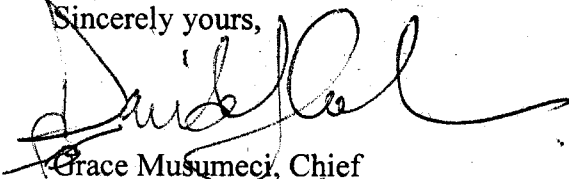
8. Section 5.1 Cumulative Impacts - Land Use and Transportation. Approximately 60 acres of Punto Medio Mundo (Parcel 38) will be transferred to the Department of Homeland Security as an active small arms range, but there is no discussion of access to the site. As Parcel 39 (land access for Parcel 38) is to be maintained as a conservation area, any roads or expected roadway improvements through this parcel that may need to occur to allow access to the range should be discussed. If the site is to be accessed by water, please discuss any port facilities.

9. Section 5.4 Terrestrial and Marine Environments and Threatened and Endangered Species. The section states that the Puerto Rico Planning Board will adopt a Special Zoning Plan based on the proposed Reuse Plan for the development of NAPR. The Zoning Plan will contain the conservation measures prepared by the Navy to

minimize impacts to endangered species as the property is developed. Will disposal of the property by the Navy be delayed until the zoning plan is complete?

Please send us a copy of your final decision document for our file. If you have any questions regarding these comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Grace Musumeci", with a long, sweeping horizontal flourish extending to the right.

Grace Musumeci, Chief
Environmental Review Section
Strategic Planning and Multi-Media Programs Branch